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ANDREW M. LASKIN

July 31, 2007

Via ECF and First Class Mail

Hon. George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Burke v. Rodriguez*
07 Civ. 3732 (GBD)

Dear Judge Daniels:

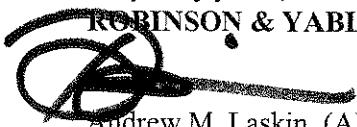
I am the attorney for plaintiff in the referenced matter. I have conferred with defense counsel regarding the matters raised herein and have consent for my application. I am presently engaged on trial before Justice Knipel in Supreme Court, Kings County. I have a jury selected and will begin my case in chief today. I expect the trial will last approximately one week. Our initial case management conference is scheduled for August 7, 2007, and I request the conference be adjourned for 45 days. No prior application for an adjournment has been made.

A further basis exists for the requested adjournment. Defendant has filed a Rule 12(b) motion, and plaintiff's opposition papers, as per stipulation between the parties, are due on August 6, 2007. Defense counsel has agreed to an additional ten days time for plaintiff to file her opposition papers and, naturally, we agree to provide defendant a corresponding extension of time to serve his reply. Based upon the foregoing, the parties agree to have a fully briefed motion before your Honor before we proceed with the initial case management conference. Perhaps it might serve judicial economy to utilize one date for oral argument and the initial conference.

Finally, despite extensive efforts on my part, I have been unable to change the notification email address on the docket from that of my prior firm. So as to ensure that I receive all future notification, I ask that your Honor's Courtroom Deputy please change my email address on the docket to alaskin@robyablaw.com.

Very truly yours,

ROBINSON & YABLON, P.C.



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